

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

EMANUEL GRAYSON
Plaintiff,

v.

UNITED REVENUE CORP.,
Defendant.

) **JURY TRIAL DEMANDED**

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) **Case No. CIV-21-989-J**

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COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff, Emanuel Grayson (“Plaintiff” or “Grayson”), an individual consumer, against Defendant, United Revenue Corp., (“URC”) for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331. Venue in this District is proper in that the Defendant transacts business in Oklahoma City, Oklahoma County, Oklahoma, and the conduct complained of occurred in Oklahoma City, Oklahoma County, Oklahoma.

III. PARTIES

3. Plaintiff Grayson is a natural person residing in Oklahoma City, Oklahoma County, Oklahoma. Grayson is a consumer as defined by the FDCPA, 15 U.S.C. §1692a(3).

4. Upon information and belief, Defendant URC is a Texas corporation with its principal place of business located at 204 Billings St Ste., 120, Arlington, TX 76010.

5. URC is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempts to collect consumers' debts alleged to be due to others.

IV. FACTS OF THE COMPLAINT

6. Defendant URC is a "debt collector" as defined by the FDCPA, 15 U.S.C 1692a(6).

7. On or about March 8, 2021, Plaintiff reviewed his credit report on "credit karma."

8. On the report, Plaintiff observed a trade line from Debt Collector.

9. Defendant URC furnished a trade line of \$1,710, allegedly owned to Texas Medicine Resources.

10. Also on February 11, 2021, Plaintiff made a dispute via telephone, however on September 18, 2021, Plaintiff re-checked his credit reports and Defendant has had several communications with the consumer reporting agencies and Defendant failed to communicate that the debt was disputed by Plaintiff.

11. URC's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Plaintiff, and further caused Plaintiff severe humiliation, emotional distress, and mental anguish, along with damage to his FICO scores.

V. FIRST CLAIM FOR RELIEF
(Defendant United Revenue Corp.,)
15 U.S.C. §1692e(8)

12. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.

13. Defendant violated the FDCPA.

14. Defendant's violations include, but are not limited to, the following:

(a) Defendant violated 15 U.S.C § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies that the alleged debt was in dispute by Plaintiff.

15. As a result of the above violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages and costs.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Emanuel Grayson respectfully demands a jury trial and requests that judgment be entered in his favor and against the Debt Collector for:

- A. Judgment in favor of Plaintiff for Defendant's violations of the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(1)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2);
- D. Cost and reasonable attorney's fees pursuant to 15 U.S.C 1692k(3); and
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:

s/ Nkem A. House

Nkem A. House, OBA #21219

House Law Group

425 W. Wilshire Blvd., Suite E

Oklahoma City, OK 73116

405.633.1709 (telephone)

houselawfirm@gmail.com (email)

ATTORNEY FOR PLAINTIFF